

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	Chapter 11
KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Debtor.</i>	§	Case No. 20-50805

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KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Adversary No. 20-05027
DMA Properties, Inc., et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

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**PROPOSED ORDER GRANTING DMA AND LONGBRANCH’S MOTION  
FOR ATTORNEYS’ FEES**

On this day, the Court considered the Motion for Attorneys’ Fees filed by DMA Properties and Frank Daniel Moore (collectively, “DMA”) and Longbranch Energy

(“Longbranch”). Having reviewed the parties’ briefing, the governing law, and the case file as a whole, the Court finds the motion is meritorious and should be granted.

It is therefore ORDERED that DMA and Longbranch’s Motion for Attorneys’ Fees is GRANTED and that DMA and Longbranch are awarded fees under the Texas Declaratory Judgment Act, the Federal Declaratory Judgment Act, and Texas Civil Practice and Remedies Code § 38.001.

It is further ORDERED that DMA, Moore, and Longbranch are awarded \$989,728.38 in attorneys’ fees in connection with their declaratory, breach of contract, and breach of fiduciary duty claims against Wright; KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; and KrisJenn Ranch, LLC-Series Pipeline ROW.

It is finally ORDERED that DMA, Moore, and Longbranch are awarded conditional appellate fees’ in connection with their declaratory, breach of contract, and breach of fiduciary duty claims against Wright; KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; and KrisJenn Ranch, LLC-Series Pipeline ROW in the event of an unsuccessful appeal by Wright or his entities with respect to those claims. Specifically, the Court conditionally awards \$42,000 in reasonable and necessary attorneys’ fees if the Court’s judgment is appealed to the district court, \$85,000 in reasonable and necessary attorneys’ fees for briefing would be reasonably incurred if this matter is appealed to the Fifth Circuit, and \$25,000 in attorneys’ fees in connection with oral argument if requested by the Fifth Circuit.

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Order Prepared By:

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DMA and Longbranch respectfully request that the following parties (in addition to counsel list above) receive copies of this order if signed:

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